

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Jennifer Rebecca Lambert  
Brent Deray Lambert, Debtors**

**Case No. 25-50502-KMS  
CHAPTER 7**

**NOTICE OF MOTION TO PARTIALLY AVOID JUDICIAL LIEN**

YOU ARE HEREBY NOTIFIED that a Motion to void the Judgment Lien of American Express National Bank has been filed on behalf of Jennifer Rebecca Lambert and Brent Deray Lambert.

YOU ARE HEREBY FURTHER NOTIFIED that TWENTY-ONE (21) DAYS from the date of this Notice are granted in which a written objection or other responsive pleading must be filed with Clerk, U.S. Bankruptcy Court, Southern District of Mississippi, Thad Cochran United States Courthouse, 501 E. Court St., Suite 2.300, Jackson, MS 39201; and with the undersigned attorney for the Trustee at the address listed below. If no objections are filed, the Court may consider this matter EX PARTE. Should objections be filed, a hearing will be held on the aforesaid Motion at a date to be later determined by the Court.

Date: May 15, 2025

Signature: /s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. (MSBN 103469)  
Jennifer A Curry Calvillo (MSBN 104367)  
The Rollins Law Firm, PLLC  
PO Box 13767  
Jackson, MS 39236  
601-500-5533  
trollins@therollinsfirm.com



Indexing Instructions: SW 1/4 of SE 1/4, of Section 31, Township 8 North, Range 11 West, 1<sup>st</sup> Judicial District, Jones County, Mississippi.



III.

That the Debtors seek an Order from this Court voiding the Judgment listed in Paragraph II above to the extent it is a lien against their homestead and impairs the debtors' right to claim their homestead exemption pursuant to §85-3-21, Mississippi Code of 1972.

WHEREFORE, Debtors respectfully request that this Court enter an order voiding the lien of American Express National Bank against them which impairs their homestead exemption, and for such other relief as is deemed just.

Dated May 15, 2025

Respectfully submitted,

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)

Jennifer A Curry Calvillo (MSBN 104367)

The Rollins Law Firm, PLLC

PO Box 13767

Jackson, MS 39236

601-500-5533

trollins@therollinsfirm.com



CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion to Partially Avoid Lien was forwarded on May 15, 2025, to:

By First Class U.S. Mail, Postage Prepaid:

American Express National Bank  
c/o President/CEO  
115 West Towne Ridge Parkway,  
Sandy, UT 84070

Morgan D. Bishop  
The Parnell Law Group, LLC  
P.O. Drawer 217  
Purvis, MS 39475

By Electronic CM/ECF Notice:

Case Trustee  
U.S. Trustee

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.